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Attorneys for Cerberus Capital Management, L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	:	Case No. 12-12020 (MG)
	:	
Debtors.	:	Jointly Administered
	:	
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**NOTICE OF STIPULATION ADOPTING UNIFORM PROTECTIVE ORDER FOR
EXAMINER DISCOVERY FOR PURPOSES OF DISCOVERY OF
CERBERUS CAPITAL MANAGEMENT, L.P. BY
THE STEERING COMMITTEE GROUP OF RMBS INVESTORS**

PLEASE TAKE NOTICE that non-Debtors Cerberus Capital Management, L.P.
("Cerberus") and the Steering Committee Group of RMBS Investors (the "Steering Committee")
hereby file the *Stipulation Adopting Uniform Protective Order for Examiner Discovery for
Purposes of Discovery of Cerberus Capital Management, L.P. by the Steering Committee Group
of RMBS Investors*, attached hereto as Exhibit A, in connection with the *Order (I) Granting
Examiner Authority to Issue Subpoenas for the Production of Documents and Authorizing the
Examination of Persons and Entities, (II) Establishing Procedures for Responding to Those
Subpoenas, (III) Approving Establishment of a Document Depository and Procedures to Govern
Use, and (IV) Approving Protective Order*, dated August 20, 2012 [ECF No. 1223].

Respectfully Submitted,

Dated: October 24, 2012
New York, New York

SCHULTE ROTH & ZABEL LLP

By: /s/: Howard O. Godnick
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